RM 222

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ORIGINAL FILE

Grass Valley Group
A TEKTRONIX COMPANY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, DC 20554

July 23, 1992

Dear Ms. Searcy:

Re: MM Docket 87-268

On June 26 I sent to your office a Federal Express package containing the comments of Grass Valley Group, and comments from myself as an individual (10 copies of each). I have just received from the Downtown Copy Center copies of the comments filed; in the package I received the Grass Valley Group comments are included, my personal comments are not.

I do not know whether the copy center made an error, or whether I made some error which resulted in my comments not being accepted. I attach a copy for identification purposes and should be grateful if you could advise me whether these comments were filed. If not, I would appreciate any advice you may be able to offer as to why the comments were not accepted.

Sincerely:

Peter D. Symes

Peter D. Symes
Tel: (916) 478-3437
Fax: (916) 478-3180

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Advanced Television Systems	)	
and Their Impact upon the	)	MM Docket No. 87-268
Existing Television Broadcast	)	
Service	)	

To: The Commission

COMMENTS OF PETER D. SYMES

The opinions expressed herein are those of the author only

I respectfully offer the following comments and proposals in response to the SECOND REPORT AND ORDER/FURTHER NOTICE OF PROPOSED RULE MAKING adopted by the Commission on April 9, 1992.

1. INTRODUCTION AND QUALIFICATION

1.1 I am an engineer who has been active in the television broadcasting industry for twenty-five years. At this time, I am a participant in various aspects of the Advisory Committee process and a member of SS WP-1, IS WP-2 , and SS WP-3.

1.2 The comments offered refer to areas where I do not have any specialist expertise and are those of an interested, but non-expert observer. They are offered in the hope that the views of one attentive to the positions and needs of both broadcasters and proponents may offer a helpful perspective.

2. NEW DEVELOPMENTS

2.1 Paragraph 80 of the subject RO/FNPRM seeks comment on the finding that "the five proponent ATV systems now under consideration represent the state of available technology." The paragraph also requests "information on any other new developments (1) that offer important new benefits and (2) which are in a sufficiently concrete state of development to be considered with existing systems."

2.2 I believe that the findings as related to video compression technology are correct, and that consideration of emerging technologies would significantly delay the process.

2.3 I believe the situation with digital transmission technologies is less clear. New technologies such as Coded Orthogonal Frequency Division Multiplex (COFDM) are being tested in Europe and could offer important benefits, such as the ability to use co-channel repeaters within the service area of the main transmitter.

2.4 One proponent recently suggested that a system of low power co-channel repeaters could be employed to extend the service area of a main transmitter. Other proponents indicated that such a technique could be used with their systems, but questions have been raised as to whether such techniques are practical with the transmission methods proposed.

2.5 Co-channel repeaters offer major potential benefits. Spectrum efficiency is greatly enhanced, and a system of low power repeaters in areas of fringe reception results in the service area of a station being more nearly equal to its interference area. Many broadcasters who currently employ a high power transmitter may be able to service their populations more effectively with several medium and low power transmitters. For some stations, such an approach could remove the need for a new main tower.

2.6 I cannot offer expert advice on this subject, but believe the potential benefits of co-channel repeaters are so great that the feasibility of this system should be investigated.

2.7 I offer the suggestion that, following the selection of a system, the field testing should specifically address the practicality of co-channel repeaters.

2.8 Further, I would suggest that, concurrently with the field testing, a task force should examine whether the application of new transmission technologies to the chosen system could offer important new benefits.

Respectfully submitted,

By: _____

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June 26, 1992